

EPA REGION VIII
SUPERFUND BRANCH

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October 31, 2004

Jim Christiansen
EPA Region VIII
999 18th St., Suite 300
Denver, CO 80202

RE: Libby Railyard Biotite Removal, Libby, Montana
EMR Project No. 5539.004
October 22, 2004 Weekly Progress Report

Dear Mr. Christiansen,

Per the Administrative Order on Consent for Removal, the following is the Weekly Progress Report submitted by EMR, Inc. (EMR) on behalf of the Burlington Northern and Santa Fe Railway Company (BNSF) for the Libby Railyard, Montana, Libby Asbestos Site, Libby Montana. In addition to this report, EMR will also be responsible for the required monthly report on this project through the close of this project.

CURRENT WEEK'S ACTIVITIES

Envirocon, Inc. (Envirocon) completed soil excavation on the west end of the site and shipped 1,705 tons in 132 truckloads to the Lincoln County Landfill between Monday, October 18, 2004 and Friday, October 22, 2004. Clearing and grubbing of shrubs and brush was completed along the northern boundary at the west end of the Site. The final load of potentially impacted material was shipped to the Lincoln County Landfill on Thursday, October 21, 2004. During this week Envirocon was also hauling clean fill and sub-ballast into the site for backfilling.

Montana Rail Services returned to the site to load gondolas with steel but was not able to get the gondola cars and will return to complete their work.

HKM provided engineering tests on the site to confirm that compaction was within the design parameters for the areas filled and compacted on site to date.

Ms. Courtney Zamora of Volpe indicated that the County Sanitation Department had verbally authorized the placement of approximately two loads of tie debris into the asbestos cell of the Lincoln County Landfill. The debris was shipped to the landfill on October 21, 2004.

Mr. Shawn Southern and Mr. Philip Burden from BNSF visited the site during the week. Mr. Southern is a Certified Industrial Hygienist / Certified Safety Professional And Mr. Burden is BNSF's Division Safety Assistant. These gentlemen visited the site to assure that all appropriate safety concerns and work practices were addressed during the conclusion of the work. They did not note any health or safety concerns during their visit and were pleased at the work practices being employed.

Air samples were collected daily through October 22, 2004. Personal samples are being analyzed by a combination of Phase Contrast Microscopy (Method 7400, Issue 2) and Transmission Electron Microscopy (TEM) AHERA method. Area samples are being analyzed by TEM AHERA Method. Preliminary laboratory results for TEM samples are being submitted to the USEPA and Volpe via facsimile upon receipt by EMR in Minneapolis, Minnesota. Final laboratory data will be submitted in hard copy form in the final report. Electronic Chain of Custody forms will be submitted to Volpe in the care of Mr. Charles Lindenbaum.

The laboratory detected one asbestos structures in air sample BN-00480 resulting in airborne asbestos concentrations of 0.0049 Structures per cubic centimeter (S/cc). The detectable concentrations of asbestos or LA fibers did not exceed the clean air standard of 0.01 fibers per cubic centimeter, thus the workers did not exceed the protection of their respirators.

Clearance sample results for BR-47000 and BR-48000 have been received. No LA was detected in these sample results. Sample BR-48000 was the last clearance sample to be collected for this phase of the project; soil sampling is complete.

Clearance soil samples are being collected in the areas of over-excavated areas on the Site; as of the October 22, results for all areas excavated were received including clearance samples BX -18000, BX-29001, BX-30000, BX-32000, and BY-41000. Sample BY-41000 was a second over-excavation on that sample area after sample results for BX-41000 indicated the presence of LA at less than one percent (<1%) tremolite/actinolite.

All soil samples are submitted for analysis by Polarized Light Microscopy (PLM) method 9002, Issue 2. Additional discreet samples were submitted but were not analyzed at this time. Preliminary data has been received by EMR and was submitted via facsimile to the USEPA. No final copies of soil analytical data collected last week have been received.

PROBLEMS ENCOUNTERED

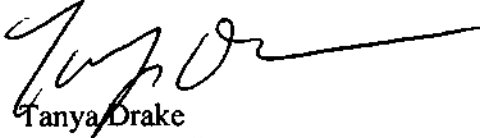
No problems have been encountered to date.

ACTIVITIES PLANNED FOR NEXT TWO WEEKS

Backfilling and grading will continue in areas that have passed soil clearance without detections of LA. Cutting and filling will continue until final sub-grade elevations are achieved.

If you have any questions or require further explanation concerning the above information, please call Tanya Drake of EMR at (763) 277-5200, Chuck Soule of Kennedy/Jenks Consultants at (253) 874-0555, or David Smith of BNSF at (406) 447-2307.

Sincerely,
EMR, Inc.

A handwritten signature in black ink, appearing to read 'Tanya Drake', with a long horizontal flourish extending to the right.

Tanya Drake
Project Coordinator

cc: Mr. David Smith, BNSF Manager Environmental Remediation, Helena, Montana
Mr. Dave Diem, Kennedy/Jenks Consultants, Libby, Montana
Mr. Chuck Soule, Kennedy/Jenks Consultants, Federal Way, Washington
Ms. Courtney Zamora, Volpe Federal Programs, Libby, Montana
Mr. Dan McCaskill, BNSF Industrial Hygiene, Ft. Worth, Texas